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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

THE HACKETT MILLER COMPANY, INC., a  
Nevada corporation,

Plaintiff,

v.

GFOUR PRODUCTIONS, LLC, a Florida limited  
liability company; and SPOTLIGHT RIGHTS,  
LLC, a Florida limited liability company,

Defendants.

Case No.: 2:16-cv-00418-RFB-NJK

**STIPULATION AND (PROPOSED)  
ORDER FOR EXTENSION OF TIME  
FOR PARTIES TO FILE A  
DISCOVERY PLAN AND  
SCHEDULING ORDER PURSUANT  
TO THE COURT'S ORDER DATED  
MARCH 31, 2017 (Seventh Request)**

Plaintiff THE HACKETT MILLER COMPANY, INC. ("Plaintiff"), and Defendants GFOUR PRODUCTIONS, LLC and SPOTLIGHT RIGHTS LLC ("Defendants"), by and through their undersigned counsel, hereby stipulate and agree to a seventh extension of time of 7 days up to and including June 30, 2017, for the parties to file a Joint Discovery Plan and Scheduling Order with the Court pursuant to the Court's Minute Order dated March 31, 2017 (ECF No. 29).

On March 30, 2017, the Court denied without prejudice Defendant's Motion to Dismiss for (1) Lack of Personal Jurisdiction, (2) Failure to Join a Necessary Party, and (3) Improper Venue, and (4) Request to Transfer Venue (ECF No. 22) and ordered the parties to engage in jurisdictional discovery for a period of 60 days commencing March 31, 2017, and to submit a joint proposed discovery/scheduling order within one week from March 31, 2017.

1 To date, the parties have filed six extensions of time to file a discovery plan (ECF Nos.  
2 30, 32, 34, 36, 37, and 38) and one extension of the jurisdictional discovery (ECF No. 34) – all of  
3 which have been granted by this Court (ECF Nos. 31, 33, 35, 39, 40, and 41). The good cause for  
4 all of the extensions was that the parties were engaging in substantive settlement discussions.

5 In the most recent stipulation (ECF No. 38), the parties notified the Court that on June 14,  
6 2017, the parties agreed upon and finalized all terms of the written settlement agreement that the  
7 parties had been negotiating, but that the parties needed additional time to sign the circulated  
8 execution version of the settlement agreement and then prepare and file a dismissal of this case  
9 with the Court.

10 On June 14, 2017, Plaintiff's counsel sent the execution version of the settlement  
11 agreement to Plaintiff for signature. Unfortunately, due to numerous business and personal family  
12 commitments along with a scheduled vacation by the Plaintiff's primary principal, whom  
13 Plaintiff's counsel has been working with in connection with this settlement agreement and who  
14 would be the individual signing the settlement agreement on behalf of Plaintiff, Plaintiff's counsel  
15 has not yet received a signed settlement agreement from Plaintiff. Plaintiff's counsel currently  
16 expects to receive a signed settlement agreement from Plaintiff sometime around Wednesday,  
17 June 28, 2017.

18 By this Stipulation, the parties request that the deadline to file a joint proposed discovery  
19 plan/scheduling order be extended by 7 days to June 30, 2017. This is the seventh request for an  
20 extension of time by both parties to file the joint proposed discovery/scheduling order.

21 Good cause exists for this request because while the parties have agreed upon and  
22 memorialized in writing all terms and conditions of a settlement agreement to resolve this  
23 litigation, the parties still require additional time to obtain signatures from the parties. For these  
24 reasons, this stipulated request is made for good cause and not for purposes of delay.

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1 The parties note that jurisdictional discovery in this matter is set to close on June 30, 2017  
2 (ECF No. 35) and hereby stipulate and agree that Plaintiff shall not seek any extension of the  
3 jurisdictional discovery period.

4  
5 Dated: June 23, 2017

Dated: June 23, 2017

6 Respectfully Submitted,

Respectfully Submitted,

7 /s/ Ryan Gile

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17 *Attorneys for Defendants, GFour Productions,*  
18 *LLC and Spotlight Rights, LLC*

19 **IT IS SO ORDERED.**

20 

21 RICHARD F. BOULWARE, II

22 United States District Judge

23 DATED this 29th day of August, 2017.